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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF ARIZONA**

10
11 Kini M. Seawright; *et al.*,

12 Plaintiff,

13 v.

14 State of Arizona; *et al.*,

15 Defendants.

No. CV11-01304-PHX-JAT

**DEFENDANTS' MOTION TO SEAL
EXHIBITS TO DEFENDANTS'
STATEMENT OF FACTS IN SUPPORT
OF SUMMARY JUDGMENT MOTION**

16 Defendants¹, through undersigned counsel, pursuant to LRCiv 5.6, move this
17 Court for an order directing the Clerk of the Court to file under seal the following
18 attachments to Exhibits to Defendants' Separate Statement of Facts in support of
19 summary judgment motion that were lodged under seal in conjunction with Defendants'
20 statement of facts in support of Defendants' summary-judgment motion.

21 1. Exhibit B, Declaration of Keith Smith:

22 Attachment 1: Aerial Photograph of Arizona State Prison Complex
23 ("ASPC")-Lewis;

24 Attachment 2: Aerial Photograph of ASPC-Lewis-Stiner Unit;

25 Attachment 3: Floor Diagram of ASPC-Lewis-Stiner Unit, inmate Dorm 2;

26
27 ¹ Defendants are the State of Arizona, Edna Jackson-Bey, Clayton Thompson, and
28 Jennifer Blondin.

Attachment 5: ASPC-Lewis Staffing Numbers and Cross-Leveling Chart

Attachment 6: ASPC-Lewis-Stiner Unit Post Priority Collapse Chart

2. Exhibit C, Declaration of Edna Jackson-Bey:

Attachment 1: Floor Diagram of ASPC-Lewis-Stiner Unit, inmate Dorm 2;

Attachment 2: Post Order PO-054-STI, Housing Unit Security Officer.

Defendants have a compelling governmental interest in keeping these documents sealed. These exhibits contain security information about ASPC-Lewis' prison layout and prison procedures that, if revealed, would create a security concern and could endanger the inmates, the prison staff, other law enforcement officers, and the general public.

For the foregoing reasons, Defendants respectfully request that the Court order the Clerk of the Court to file under seal Defendants' Attachments 1, 2, 3, 5 and 6 to Exhibit B and Attachments 1 and 2 to Exhibit C to the Separate Statement of Facts in Support of Summary Judgment Motion, lodged under seal.

RESPECTFULLY SUBMITTED this 28th day of February, 2013.

Thomas C. Horne
Attorney General

s/Michael E. Gottfried
Michael E. Gottfried
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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2013, I electronically transmitted the attached document to the Clerk of the Court using the ECF System. This document and the Notice of Electronic Filing were automatically served on the same date to the following, who are registered participants of the CM/ECF System:

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